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## NEW MEXICO ENVIRONMENT DEPARTMENT

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BUTCH TONGATE  
Cabinet Secretary

J. C. BORREGO  
Deputy Secretary

### Certified Mail – Return Receipt Requested

May 1, 2018

Mr. Rick Carpenter  
Interim Director  
341 Caja del Rio Road  
Santa Fe, NM 87506

**Re: Buckman Direct Diversion Project; Major Industrial; SIC 4941; NPDES Compliance  
Evaluation Inspection; NPDES # NM0030848; April 3, 2018**

Dear Mr.Carpenter:

Enclosed please find a copy of the report and check list for the referenced inspection that the New Mexico Environment Department (NMED) conducted at your facility on behalf of the U.S. Environmental Protection Agency (USEPA). This inspection report will be sent to the USEPA in Dallas for their review. These inspections are used by USEPA to determine compliance with the National Pollutant Discharge Elimination System (NPDES) permitting program in accordance with requirements of the federal Clean Water Act.

Further explanations and problems noted during this inspection are discussed on the completed form and checklist of this inspection report. Introduction, treatment scheme, and problems noted during this inspection are discussed in the "Further Explanations" section of the inspection report.

You are encouraged to review the inspection report, required to correct any problems noted during the inspection, and advised to modify your operational and/or administrative procedures, as appropriate. If you have comments on or concerns with the basis for the findings in the NMED inspection report, please contact us (see the address below) in writing within 30 days from the date of this letter. Further, you are encouraged to notify in writing both the USEPA and NMED regarding modifications and compliance schedules at the addresses below:

NPDES Enforcement Coordinator  
Environmental Protection Agency, Region 6  
NPDES Enforcement Branch (6EN-WM)  
1445 Ross Avenue, Suite 1200  
Dallas, Texas 75202-2733

Program Manager  
New Mexico Environment Department  
Surface Water Quality Bureau (N2050)  
Point Source Regulation Section  
P.O. Box 5469  
Santa Fe, New Mexico 87502

**Buckman Direct Diversion Project, NPDES # NM0030848**

**May 1, 2018**

**Page 2 of 2**

David Long (Long.David@epa.gov) is USEPA Region 6's Acting NPDES Enforcement Coordinator at the above address. If you have any questions about this inspection report, please contact Jennifer Foote at (505)827-0596 or at Jennifer.Foote@state.nm.us.

Sincerely,

*/s/ Sarah Holcomb*

Sarah Holcomb  
Program Manager  
Point Source Regulation Section  
Surface Water Quality Bureau

cc: Carol Peters-Wagnon, USEPA (6EN-WM) by e-mail  
David Long, USEPA (6EN-WM) by e-mail  
Nancy Williams, USEPA (6EN-WC) by e-mail  
Amy Andrews, USEPA (6EN-WM) by e-mail  
David Esparza, USEPA (6EN-WM) by e-mail  
Brent Larsen, USEPA (6WQ-PP)  
Robert Italiano, NMED District II by e-mail  
Daniela Bowman, BDD by e-mail  
Charles Vokes, BDD by e-mail



Form Approved  
OMB No. 2040-0003  
Approval Expires 7-31-85

## NPDES Compliance Inspection Report

### Section A: National Data System Coding

|   |                                   |                                   |                                   |  |   |
|---|-----------------------------------|-----------------------------------|-----------------------------------|--|---|
| Transaction Code  | NPDES                             | yr/mo/day                         | Inspection Type                   | Inspector  | Fac Type  |
| 1 <input type="text" value="N"/> 2 <input type="text" value="5"/> 3 <input type="text" value="N"/> <input type="text" value="M"/> <input type="text" value="0"/> <input type="text" value="0"/> <input type="text" value="3"/> <input type="text" value="0"/> <input type="text" value="8"/> <input type="text" value="4"/> <input type="text" value="8"/> 11 <input type="text" value="1"/> <input type="text" value="8"/> <input type="text" value="0"/> <input type="text" value="4"/> <input type="text" value="0"/> <input type="text" value="3"/> 17 <input type="text" value="C"/> 18 <input type="text" value="S"/> 19 <input type="text" value="S"/> 20 <input type="text" value="1"/> | Remarks                           |                                   |                                   |  |   |
| <input type="text" value="M"/> <input type="text" value="A"/> <input type="text" value="J"/> <input type="text" value="O"/> <input type="text" value="R"/> <input type="text" value="I"/> <input type="text" value="N"/> <input type="text" value="D"/> <input type="text" value="U"/> <input type="text" value="S"/> <input type="text" value="T"/> <input type="text" value="R"/> <input type="text" value="I"/> <input type="text" value="A"/> <input type="text" value="L"/>  |                                   |                                   |                                   |  |   |
| Inspection Work Days  | Facility Evaluation Rating        | BI                                | QA                                | Reserved   |   |
| 67 <input type="text" value=""/> <input type="text" value=""/> <input type="text" value=""/> 69   | 70 <input type="text" value="4"/> | 71 <input type="text" value="N"/> | 72 <input type="text" value="N"/> | 73 <input type="text" value=""/> <input type="text" value=""/> <input type="text" value=""/> | 74 <input type="text" value=""/> <input type="text" value=""/> <input type="text" value=""/> 75 <input type="text" value=""/> <input type="text" value=""/> <input type="text" value=""/> |

### Section B: Facility Data

|   |  |   |
|---|--|---|
| Name and Location of Facility Inspected (For industrial users discharging to POTW, also include POTW name and NPDES permit number)<br><b>BUCKMAN DIRECT DIVERSION –From</b> Hwy 599 Take exit 6 S Meadows Rd, take the traffic circle to NM-599 frontage road heading south, continue 1.4 miles TURN RIGHT ON CAJA DEL RIO ROAD AND FOLLOW 3.5 miles UNTIL YOU SEE THE SIGN FOR THE BDD. TURN LEFT INTO THE FACILITY. | Entry Time /Date<br>1:45pm 4/3/18  | Permit Effective Date<br>9-1-14   |
| Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)<br>Charles Vokes, BDD Facilities Manager 505-955-4507<br>Daniela Bowman, BDD Regulatory Compliance Officer, 505-955-4504<br>Juan Portillo, (505) 955-4505   | Exit Time/Date<br>4:30pm 4/3/18  | Permit Expiration Date<br>8-31-19   |
| Name, Address of Responsible Official/Title/Phone and Fax Number<br>Mr. Rick Carpenter/ Interim Director/955-6816<br>341 CAJA DEL RIO ROAD, SANTA FE, NM 87507  | Contacted<br>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> | Other Facility Data<br>LAT N. 35° 50.174"<br>LONG W. -106°09.732"<br>SIC 4941 |

### Section C: Areas Evaluated During Inspection

(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

|   |                           |   |                         |   |                          |   |                      |
|---|---------------------------|---|-------------------------|---|--------------------------|---|----------------------|
| S | Permit                    | S | Flow Measurement        | S | Operations & Maintenance | N | CSO/SSO              |
| S | Records/Reports           | M | Self-Monitoring Program | N | Sludge Handling/Disposal | N | Pollution Prevention |
| S | Facility Site Review      | N | Compliance Schedules    | N | Pretreatment             | N | Multimedia           |
| S | Effluent/Receiving Waters | S | Laboratory              | N | Storm Water              | N | Other:               |

### Section D: Summary of Findings/Comments (Attach additional sheets if necessary)

See attached sheets for further details.

|  |   |                 |
|--|---|-----------------|
| Name(s) and Signature(s) of Inspector(s)<br><b>Jennifer Foote</b> /s/ Jennifer Foote           | Agency/Office/Telephone/Fax<br>NMED/SWQB 505-827-0596         | Date<br>4/30/18 |
| Signature of Management QA Reviewer<br><b>Sarah Holcomb, Program Manager</b> /s/ Sarah Holcomb | Agency/Office/Phone and Fax Numbers<br>NMED/SWQB 505-827-2798 | Date<br>4/30/18 |

FACILITY NAME: Buckman Direct Diversion

DATE April 3, 2018

PERMIT NO. NM0030848

## SECTION A - PERMIT VERIFICATION

PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS  
DETAILS:☒ S ☐ M ☐ U ☐ NA (FURTHER EXPLANATION ATTACHED NO )

1. CORRECT NAME AND MAILING ADDRESS OF PERMITTEE

☒ Y ☐ N ☐ NA

2. NOTIFICATION GIVEN TO EPA/STATE OF NEW DIFFERENT OR INCREASED DISCHARGES

☐ Y ☐ N ☒ NA

3. NUMBER AND LOCATION OF DISCHARGE POINTS AS DESCRIBED IN PERMIT

☒ Y ☐ N ☐ NA

4. ALL DISCHARGES ARE PERMITTED

☒ Y ☐ N ☐ NA

## SECTION B - RECORDKEEPING AND REPORTING EVALUATION

RECORDS AND REPORTS MAINTAINED AS REQUIRED BY PERMIT.  
DETAILS:☒ S ☐ M ☐ U ☐ NA (FURTHER EXPLANATION ATTACHED Yes )

1. ANALYTICAL RESULTS CONSISTENT WITH DATA REPORTED ON DMRs.

☒ Y ☐ N ☐ NA

2. SAMPLING AND ANALYSES DATA ADEQUATE AND INCLUDE.

☒ S ☐ M ☐ U ☐ NA

a) DATES, TIME(S) AND LOCATION(S) OF SAMPLING

☒ Y ☐ N ☐ NA

b) NAME OF INDIVIDUAL PERFORMING SAMPLING

☒ Y ☐ N ☐ NA

c) ANALYTICAL METHODS AND TECHNIQUES.

☒ Y ☐ N ☐ NA

d) RESULTS OF ANALYSES AND CALIBRATIONS.

☒ Y ☐ N ☐ NA

e) DATES AND TIMES OF ANALYSES.

☒ Y ☐ N ☐ NA

f) NAME OF PERSON(S) PERFORMING ANALYSES.

☒ Y ☐ N ☐ NA

3. LABORATORY EQUIPMENT CALIBRATION AND MAINTENANCE RECORDS ADEQUATE.

☒ S ☐ M ☐ U ☐ NA

4. PLANT RECORDS INCLUDE SCHEDULES, DATES OF EQUIPMENT MAINTENANCE AND REPAIR

☒ S ☐ M ☐ U ☐ NA

5. EFFLUENT LOADINGS CALCULATED USING DAILY EFFLUENT FLOW AND DAILY ANALYTICAL DATA.

☐ Y ☐ N ☒ NA

## SECTION C - OPERATIONS AND MAINTENANCE

TREATMENT FACILITY PROPERLY OPERATED AND MAINTAINED.  
DETAILS:☒ S ☐ M ☐ U ☐ NA (FURTHER EXPLANATION ATTACHED No )

1. TREATMENT UNITS PROPERLY OPERATED.

☒ S ☐ M ☐ U ☐ NA

2. TREATMENT UNITS PROPERLY MAINTAINED.

☒ S ☐ M ☐ U ☐ NA

3. STANDBY POWER OR OTHER EQUIVALENT PROVIDED.

☒ S ☐ M ☐ U ☐ NA

4. ADEQUATE ALARM SYSTEM FOR POWER OR EQUIPMENT FAILURES AVAILABLE.

☒ S ☐ M ☐ U ☐ NA

5. ALL NEEDED TREATMENT UNITS IN SERVICE.

☒ S ☐ M ☐ U ☐ NA

6. ADEQUATE NUMBER OF QUALIFIED OPERATORS PROVIDED.

☒ S ☐ M ☐ U ☐ NA

7. SPARE PARTS AND SUPPLIES INVENTORY MAINTAINED.

☒ S ☐ M ☐ U ☐ NA

8. OPERATION AND MAINTENANCE MANUAL AVAILABLE.

☒ Y ☐ N ☐ NA

STANDARD OPERATING PROCEDURES AND SCHEDULES ESTABLISHED.

☒ Y ☐ N ☐ NA

PROCEDURES FOR EMERGENCY TREATMENT CONTROL ESTABLISHED.

☒ Y ☐ N ☐ NA

FACILITY NAME: Buckman Direct Diversion

DATE April 3, 2018

PERMIT NO. NM0030848

## SECTION C - OPERATIONS AND MAINTENANCE (CONT'D)

9. HAVE BYPASSES/OVERFLOWS OCCURRED AT THE PLANT OR IN THE COLLECTION SYSTEM IN THE LAST YEAR?  
 IF SO, HAS THE REGULATORY AGENCY BEEN NOTIFIED?  
 HAS CORRECTIVE ACTION BEEN TAKEN TO PREVENT ADDITIONAL BYPASSES/OVERFLOWS?

☐ Y ☐ N ☒ NA  
☐ Y ☐ N ☒ NA  
☐ Y ☐ N ☒ NA

10. HAVE ANY HYDRAULIC OVERLOADS OCCURRED AT THE TREATMENT PLANT?  
 IF SO, DID PERMIT VIOLATIONS OCCUR AS A RESULT?

☐ Y ☐ N ☒ NA  
☐ Y ☐ N ☒ NA

## SECTION D - SELF-MONITORING

PERMITTEE SELF-MONITORING MEETS PERMIT REQUIREMENTS.  
 DETAILS:

☐ S ☒ M ☐ U ☐ NA (FURTHER EXPLANATION ATTACHED Yes ).

1. SAMPLES TAKEN AT SITE(S) SPECIFIED IN PERMIT.

☒ Y ☐ N ☐ NA

2. LOCATIONS ADEQUATE FOR REPRESENTATIVE SAMPLES.

☐ Y ☒ N ☐ NA

3. FLOW PROPORTIONED SAMPLES OBTAINED WHEN REQUIRED BY PERMIT.

☒ Y ☐ N ☐ NA

4. SAMPLING AND ANALYSES COMPLETED ON PARAMETERS SPECIFIED IN PERMIT.

☒ Y ☐ N ☐ NA

5. SAMPLING AND ANALYSES PERFORMED AT FREQUENCY SPECIFIED IN PERMIT.

☒ Y ☐ N ☐ NA

6. SAMPLE COLLECTION PROCEDURES ADEQUATE

☐ Y ☒ N ☐ NA

a) SAMPLES REFRIGERATED DURING COMPOSITING.

☒ Y ☐ N ☐ NA

b) PROPER PRESERVATION TECHNIQUES USED.

☒ Y ☐ N ☐ NA

c) CONTAINERS AND SAMPLE HOLDING TIMES CONFORM TO 40 CFR 136.3.

☒ Y ☐ N ☐ NA

7. IF MONITORING AND ANALYSES ARE PERFORMED MORE OFTEN THAN REQUIRED BY PERMIT, ARE  
 THE RESULTS REPORTED IN PERMITTEE'S SELF-MONITORING REPORT?

☒ Y ☐ N ☐ NA

## SECTION E - FLOW MEASUREMENT

PERMITTEE FLOW MEASUREMENT MEETS PERMIT REQUIREMENTS.  
 DETAILS: USGS gage for Rio Grande and inline flowmeter for return flow

☒ S ☐ M ☐ U ☐ NA (FURTHER EXPLANATION ATTACHED NO )

1. PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED.  
 TYPE OF DEVICE electromagnetic inline flowmeter

☒ Y ☐ N ☐ NA

2. FLOW MEASURED AT EACH OUTFALL AS REQUIRED.

☒ Y ☐ N ☐ NA

3. SECONDARY INSTRUMENTS (TOTALIZERS, RECORDERS, ETC.) PROPERLY OPERATED AND MAINTAINED.

☐ Y ☐ N ☒ NA

4. CALIBRATION FREQUENCY ADEQUATE. (DATE OF LAST CALIBRATION 11/6/17 by Great Southwest Meter Testing )

☒ Y ☐ N ☐ NA

RECORDS MAINTAINED OF CALIBRATION PROCEDURES.

☐ Y ☐ N ☒ NA

CALIBRATION CHECKS DONE TO ASSURE CONTINUED COMPLIANCE.

☐ Y ☐ N ☒ NA

5. FLOW ENTERING DEVICE WELL DISTRIBUTED ACROSS THE CHANNEL AND FREE OF TURBULENCE.

☐ Y ☐ N ☒ NA

6. HEAD MEASURED AT PROPER LOCATION.

☐ Y ☐ N ☒ NA

7. FLOW MEASUREMENT EQUIPMENT ADEQUATE TO HANDLE EXPECTED RANGE OF FLOW RATES.

☒ Y ☐ N ☐ NA

## SECTION F - LABORATORY

PERMITTEE LABORATORY PROCEDURES MEET PERMIT REQUIREMENTS.  
 DETAILS: Turbidity and pH are performed in the field

☒ S ☐ M ☐ U ☐ NA (FURTHER EXPLANATION ATTACHED No )

1. EPA APPROVED ANALYTICAL PROCEDURES USED (40 CFR 136.3 FOR LIQUIDS, 503.8(b) FOR SLUDGES)

☒ Y ☐ N ☐ NA

FACILITY NAME: Buckman Direct Diversion

DATE April 3, 2018

PERMIT NO. NM0030848

**SECTION F - LABORATORY (CONT'D)**2. IF ALTERNATIVE ANALYTICAL PROCEDURES ARE USED, PROPER APPROVAL HAS BEEN OBTAINED ☐ Y ☐ N ☒ NA3. SATISFACTORY CALIBRATION AND MAINTENANCE OF INSTRUMENTS AND EQUIPMENT. ☒ S ☐ M ☐ U ☐ NA4. QUALITY CONTROL PROCEDURES ADEQUATE. ☒ S ☐ M ☐ U ☐ NA5. DUPLICATE SAMPLES ARE ANALYZED. 10 % OF THE TIME. ☒ Y ☐ N ☐ NA6. SPIKED SAMPLES ARE ANALYZED.     % OF THE TIME. ☐ Y ☐ N ☒ NA7. COMMERCIAL LABORATORY USED. ☒ Y ☐ N ☐ NALAB NAME BioAquaticsLAB ADDRESS 2501 Mayes Rd Ste 100, Carrollton TX 75006PARAMETERS PERFORMED WET**SECTION G - EFFLUENT/RECEIVING WATERS OBSERVATIONS.** ☒ S ☐ M ☐ U ☐ NA (FURTHER EXPLANATION ATTACHED NO ).

| OUTFALL NO. | OIL SHEEN | GREASE | TURBIDITY | VISIBLE FOAM | FLOAT SOL. | COLOR | OTHER |
|-------------|-----------|--------|-----------|--------------|------------|-------|-------|
| 001         | none      | none   | light     | none         | none       | none  |       |
|             |           |        |           |              |            |       |       |
|             |           |        |           |              |            |       |       |

RECEIVING WATER OBSERVATIONS: Observed at sampling port on Sediment Return Line (SRL) inside the Sediment Removal Facility (SRF) building (photo 3)

**SECTION H - SLUDGE DISPOSAL**SLUDGE DISPOSAL MEETS PERMIT REQUIREMENTS. ☐ S ☐ M ☐ U ☒ NA (FURTHER EXPLANATION ATTACHED NO ).  
DETAILS:1. SLUDGE MANAGEMENT ADEQUATE TO MAINTAIN EFFLUENT QUALITY. ☐ S ☐ M ☐ U ☒ NA2. SLUDGE RECORDS MAINTAINED AS REQUIRED BY 40 CFR 503. ☐ S ☐ M ☐ U ☒ NA3. FOR LAND APPLIED SLUDGE, TYPE OF LAND APPLIED TO: (e.g., FOREST, AGRICULTURAL, PUBLIC CONTACT SITE)**SECTION I - SAMPLING INSPECTION PROCEDURES** (FURTHER EXPLANATION ATTACHED NO ).1. SAMPLES OBTAINED THIS INSPECTION. ☐ Y ☐ N ☒ NA

2. TYPE OF SAMPLE OBTAINED

GRAB            COMPOSITE SAMPLE     METHOD            FREQUENCY           3. SAMPLES PRESERVED. ☐ Y ☐ N ☒ NA4. FLOW PROPORTIONED SAMPLES OBTAINED. ☐ Y ☐ N ☒ NA5. SAMPLE OBTAINED FROM FACILITY'S SAMPLING DEVICE. ☐ Y ☐ N ☒ NA6. SAMPLE REPRESENTATIVE OF VOLUME AND MATURE OF DISCHARGE. ☐ Y ☐ N ☒ NA7. SAMPLE SPLIT WITH PERMITTEE. ☐ Y ☐ N ☒ NA8. CHAIN-OF-CUSTODY PROCEDURES EMPLOYED. ☐ Y ☐ N ☒ NA9. SAMPLES COLLECTED IN ACCORDANCE WITH PERMIT. ☐ Y ☐ N ☒ NA

**Compliance Evaluation Inspection**  
**Buckman Direct Diversion NPDES Permit No. NM0030848**  
**Inspection Date: April 3, 2018**  
**Further Explanations**

**INTRODUCTION:**

On April 3, 2018, Jennifer Foote of the New Mexico Environment Department (NMED), Surface Water Quality Bureau (SWQB) conducted a Compliance Evaluation Inspection at the Buckman Direct Diversion drinking water treatment plant (BDD). The NPDES permit covers the discharge of sediment and river water back into the Rio Grande from the primary sedimentation treatment process. BDD has a design flow capacity to provide 15 MGD (million gallons per day) of drinking water to the City and County of Santa Fe, and is classified as a major discharger under the Federal Clean Water Act, Section 402, of the National Pollutant Discharge Elimination System (NPDES) permit program. The BDD facility started discharging to the river in November 2010. The average monthly discharge from September 2014 to February 2018 is .358 MGD, and the maximum daily discharge flow was 1.4 MGD in November 2014. BDD is assigned NPDES permit tracking number NM0030848 which regulates the discharge to the Rio Grande in the Rio Grande Basin in Segment 20.6.4.114 of the New Mexico Administrative Code (NMAC). This segment includes the designated uses of irrigation, livestock watering, wildlife habitat, marginal coldwater aquatic life, primary contact, and warmwater aquatic life; and public water supply on the main stem Rio Grande.

The NMED performs a certain number of CEIs for the U.S. Environmental Protection Agency (USEPA), Region VI, under the NPDES permit program, in accordance with the Federal Clean Water Act. USEPA uses these inspections to determine compliance with the NPDES permit program. This inspection report is based on information provided by the permittee's representatives, observations made by the NMED inspector, electronic DMRs, and records and reports kept by the permittee and/or NMED.

**INSPECTION DETAILS:**

Upon arrival at the facility, the inspector conducted an entrance interview with Ms. Daniela Bowman, Regulatory Compliance Officer, where she presented credentials and explained the purpose of the inspection. They toured the control room and accompanied Mr. Juan Portillo while he conducted the weekly sampling and testing. An exit interview was conducted with Ms. Bowman and Mr. Charles Vokes to present the preliminary findings of the inspection.

**TREATMENT SCHEME:**

The BDD diverts water from the Rio Grande, and depending on water needs, normally the BDD will operate at about one-half of full capacity. The facility will not divert from the river in three instances: 1) Due to the consideration for the endangered silvery minnow, when the river flow is low (below 150 cfs), the facility will stop pumping water, 2) when there is high turbidity in the river because sand and sediments cause problems with the water treatment membranes, and 3) when the facility receives early notification from Los Alamos National Labs regarding a storm event resulting in above five cubic feet per second at the bottom of Pueblo Canyon (at the convergence with the Rio Grande), BDD will shut down diversion.

Water intake operations are not continuous and are controlled by operators at the main BDD facility via a SCADA system. After water is drawn through the intake structure, it is pumped to the Sediment Removal Facility (SRF) building about a mile away, where the sand (about 40 % of total sediment) is mechanically separated by vortex turbines which run in parallel to remove sediments from the water. The water is then pumped to the main treatment plant, whose processes are not covered by this NPDES discharge permit. The concentrated sediment effluent generated from the gravity centrifuge process is collected in a sump at the SRF. The sump wastewater is batch discharged and returned to the Rio Grande. The discharge location to the Rio Grande (photo 2), is just downstream of the intake structure and utilizes a submerged diffuser. River flow is measured by a USGS gage just upstream of the diversion, effluent flow is measured by an inline flowmeter with a totalizer at the SRF.

**FINDINGS AND OBSERVATIONS:**

**Section B- Reporting and Recordkeeping Evaluation:** overall rating of Satisfactory

**Permit Requirements:**

The permit states in Part III.D.11, Signatory Requirements:

*All Reports required by the permit and other information requested by the Director shall be signed by a person described above or by a duly authorized representative of that person.*

The permit states in Part III.C.5, Monitoring and records:

*Monitoring must be conducted according to test procedures approved under 40 CFR Part 136*

**Observations:**

Written authorization for signatory authority was not available at the time of the inspection. *Note: the written authorization was submitted to the EPA Director 4/24/18.*

Not all of the pH buffer bottles were properly labeled with the date they were opened.

**Section D – Self-Monitoring Evaluation** – overall rating of Marginal.

**Permit Requirements:**

The permit states in Part I.A.1, Final Effluent Limits:

*\*8 Turbidity measurements are required on a weekly basis only on days when the river diversion is operating.*

The permit states in Part III.C.2, Representative Sampling:

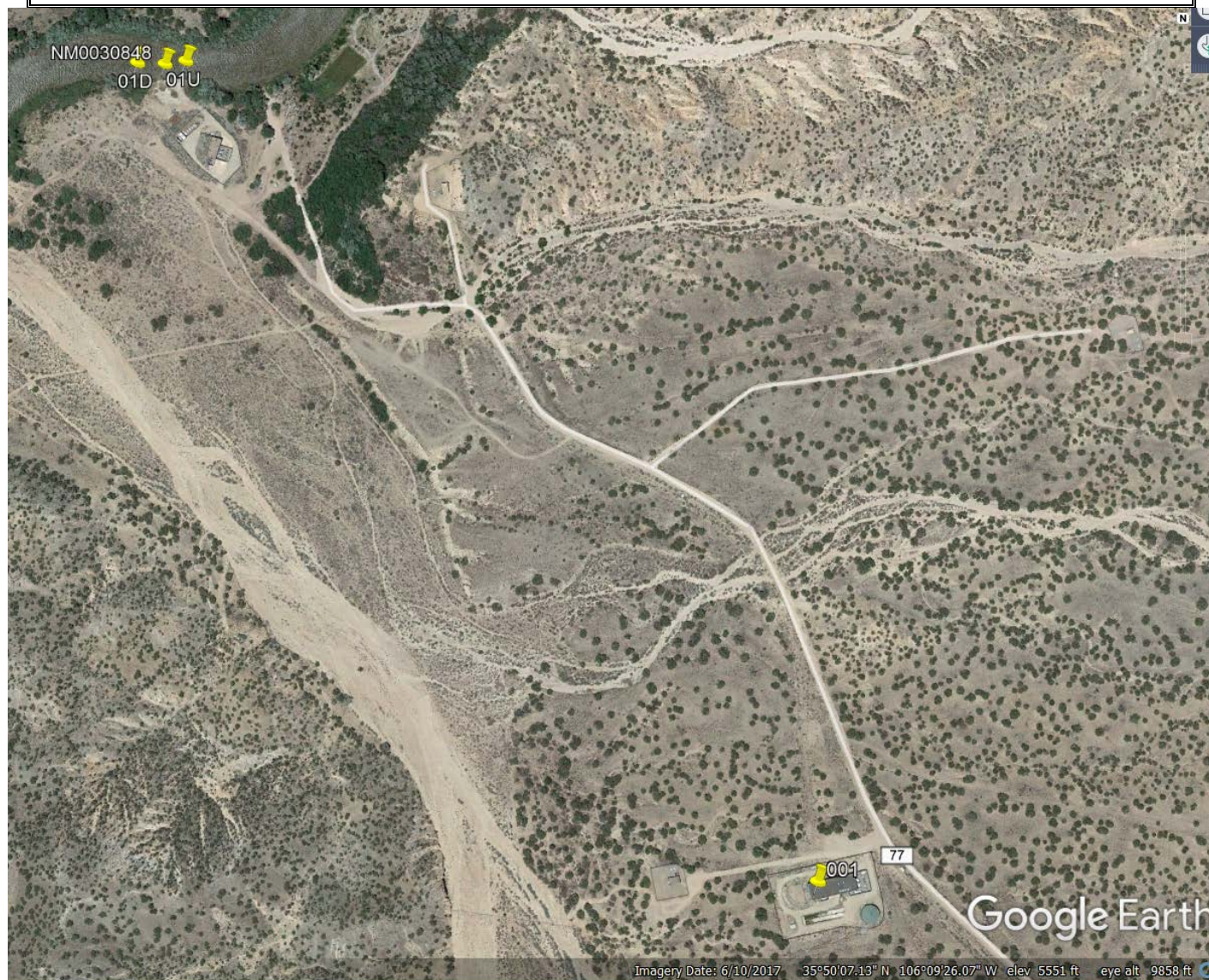
*Samples and measurements taken for the purpose of monitoring shall be representative of the monitored activity.*

**Findings:**

Though the sampling procedure follows the permit requirement to make sure the diversion is operating that the time of sampling, due to the batch discharge process of the effluent, the plant may not be concurrently discharging at all times while the diversion is occurring. There is not a way to know when the discharge arrives at the river from the plant a mile away. Therefore, the sample collection at Outfall 01D may not occur while the discharge is actually reaching the river, which may result in turbidity sampling that is not representative of the effluent.



|  |                 |                   |
|--|-----------------|-------------------|
| NMED/SWQB<br>Official Photograph Log<br>Photo # 1                                      |                 |                   |
| Photographer: Google Earth   | Date: 6/10/2017 | Time: n/a         |
| City/County: Santa Fe County   |                 | State: New Mexico |
| Location: Buckman Direct Diversion   |                 |                   |
| Subject: Sampling locations at Rio Grande and Sediment Removal Facility (SRF) building |                 |                   |





|  |                                  |               |
|--|----------------------------------|---------------|
| NMED/SWQB<br>Official Photograph Log<br>Photo # 2                                    |                                  |               |
| Photographer: Buckman Direct Diversion   | Date: unknown- approx. 2010/2011 | Time: unknown |
| City/County: Santa Fe County   | State: New Mexico                |               |
| Location: Buckman Direct Diversion   |                                  |               |
| Subject: grey pipe on right is outfall during construction (which is now underwater) |                                  |               |



|   |                   |              |
|---|-------------------|--------------|
| NMED/SWQB<br>Official Photograph Log<br>Photo # 3   |                   |              |
| Photographer: Jennifer Foote  | Date: 4/3/2018    | Time: 3:43pm |
| City/County: Santa Fe County  | State: New Mexico |              |
| Location: Buckman Direct Diversion  |                   |              |
| Subject: discharge observation at sampling port 001 on Sediment Return Line (SRL) inside the Sediment Removal Facility (SRF) building |                   |              |



|   |                |                   |
|---|----------------|-------------------|
| NMED/SWQB<br>Official Photograph Log<br>Photo # 4 |                |                   |
| Photographer: Jennifer Foote                      | Date: 4/3/2018 | Time: 3:20pm      |
| City/County: Santa Fe County                      |                | State: New Mexico |
| Location: Buckman Direct Diversion                |                |                   |
| Subject: Sampling location 01U-upstream of intake |                |                   |



|  |                |                   |
|--|----------------|-------------------|
| NMED/SWQB<br>Official Photograph Log<br>Photo # 5                                      |                |                   |
| Photographer: Jennifer Foote   | Date: 4/3/2018 | Time: 3:22pm      |
| City/County: Santa Fe County   |                | State: New Mexico |
| Location: Buckman Direct Diversion   |                |                   |
| Subject: Sampling location 01D-downstream of outfall (visible in stream above sampler) |                |                   |

